

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	CASE NO. 19 B 23757
Collette Carter,)	HON. A. BENJAMIN GOLDFAR
)	CHAPTER 13
DEBTOR.)	
)	

NOTICE OF OBJECTION TO CLAIM 1-1

To: Trustee Marilyn O Marshall, 224 S. Michigan Ave. Suite 800, Chicago, IL 60604;

City of Chicago Department of Finance, Bureau of Utility Billing and Customer Service,
121 N LaSalle St, Suite 400, Chicago, IL 60602;

City of Chicago Department of Finance, Bureau of Utility Billing and Customer Service,
PO Box 6330, Chicago, IL 60680;

Please take notice that on November 12, 2019, at 9:30 a.m., I shall appear before the Honorable A. Benjamin Goldfar in Courtroom 642 in the Federal Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois and present the attached objection and you may appear if you so choose.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditors via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on October 2, 2019.

/s/ Aaron Weinberg
Attorney for Debtor
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
(312) 913-0625

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FOR THE NORTHERN DISTRICT OF ILLINOIS
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OBJECTION TO CLAIM 1-1

NOW COMES Collette Carter, Debtor, by and through Debtor's attorneys, The Semrad Law Firm, LLC, and hereby moves this Honorable Court to enter an Order regarding Claim 1-1; Debtors state the following:

1. That on August 22, 2019, the Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. This Honorable Court has yet confirmed the Debtor's Chapter 13 Plan.
3. That on August 26, 2019, City of Chicago Department of Finance, filed a Proof of Claim, Claim 1-1, the total amount is \$18,968.67 for water service. Please see Exhibit A for Claim 1-1 Proof of Claim.
4. The Debtor does not have a legal interest in the property commonly known as 145 N. Long Ave, Chicago, IL 60644.
5. On April 8, 2019, a notice was filed by Omega R. Construction with the Cook County Recorder of deeds that they are the 100% owner of the property located at 145 N. Long Ave, Chicago, IL 60644.
6. Due to the circumstances states above, Claim 1-1 should be disallowed in its entirety.
7. Debtor respectfully requests this Honorable Court to Sustain Debtor's Objection to Claim 1-1 filed by City of Chicago Department of Finance.

8. Debtor has filed the instant case in good faith and is in a position to proceed with the Chapter 13 Plan of reorganization.

WHEREFORE, Collette Carter, Debtor, respectfully requests this Honorable Court enter an Order:

- 1.) Sustaining Debtor's Objection to Claim 1-1, filed by City of Chicago Department of Finance;
- 2.) That the priority debt of Claim 1-1 should be disallowed in its entirety; and
- 3.) For any such further relief as this Court deems fair and just.

Respectfully submitted,
/s/ Aaron Weinberg
Attorney for the Debtor
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603